

State Water Resources Control Board

December 23, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8017 1313

Mr. Trevor Johnson
Facilities Maintenance Supervisor
Orange County Transportation Authority
550 South Main Street
P.O. Box 14184
Orange, California 92863
tjohnson@octa.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT ORANGE COUNTY TRANSPORTATION AUTHORITY,
14736 SAND CANYON AVENUE, IRVINE**

Dear Mr. Johnson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on December 6, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Plot Plan/Site Map – The site map for tanks 8, 9, and 10 did not contain product piping or reference the location of the USTs with respect to buildings, or other landmarks, such as the street. The site map for tanks 1 and 11 did not include product piping for tank 11 or reference the location of the USTs with respect to buildings or other landmarks, such as the street.	All	December 6, 2016	Ongoing	23 CCR 2711(a)(8)
2	Failure to Maintain Release Response Plan – The response plan included the name of an employee who no longer works at facility. This document must be updated.	All	December 6, 2016	Ongoing	23 CCR 2632(d)(2)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Tank Information Forms (B Form) – The tank 8 information form incorrectly lists automatic transmission fluid, however it contains motor oil. The tank 9 information form incorrectly lists motor oil however it contains automatic transmission fluid. Tank 9 also incorrectly states no fill tube shut off valve, however a fill tube shut off valve was observed at the time of inspection.	Tanks 8 & 9	December 6, 2016	Ongoing	23 CCR 2711(a)
4	Failure to Monitor Product Piping – The sensor in the piping sump was unable to detect a leak at the earliest opportunity because the test boot was left on. This was corrected at the time of inspection.	Tank 1	December 6, 2016	December 6, 2016	23 CCR 2630(d)
5	Failure to Monitor Product Piping – The sensor in the under dispenser containment was unable to detect a leak at the earliest opportunity because it was incorrectly positioned at an angle. This was corrected at the time of inspection.	Tank 1	December 6, 2016	December 6, 2016	23 CCR 2630(d)
6	Failure to Monitor Product Piping – The sensor in the fill sump was unable to detect a leak at the earliest opportunity because it was raised two inches. The sensor was repositioned at the time of inspection.	Tank 11	December 6, 2016	December 6, 2016	23 CCR 2630(d)
7	Failure to Monitor Product Piping – The sensor in the fill sump was unable to detect a leak at the earliest opportunity because it was located on wrong side of sump not directly beneath product piping. This was corrected at the time of inspection.	Tank 8	December 6, 2016	December 6, 2016	23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Orange County Health Care Agency within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, 23rd Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Ms. Christine Lane
Program Manager
Orange County Health Care Agency
1241 East Dyer Road #120
Santa Ana, California 92705
clane@ochca.com

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Christine Lane, REHS
Program Manager
Orange County Health Care Agency
clane@ochca.com

Ms. Katherine Balanza
HSEC Specialist
Orange County Transportation Authority
kbalanza@octa.net

Mr. Troy Wilkins
MSS/Facilities Manager
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twilkins@octa.net